

ATT-CLEC-1 Please confirm whether the CLEC is a competitive local exchange carrier (“CLEC”) providing telecommunications service in Massachusetts, and state whether the CLEC is an affiliate of such a CLEC or of an incumbent local exchange carrier (“ILEC”) within Massachusetts. If the is an affiliate of another CLEC or an ILEC, please identify the affiliate and describe the affiliation. For purposes of these Requests, “affiliate” shall be as defined in the Communications Act of 1934. Section 3 of the Act defines the term “affiliate” as “a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For the purposes of this paragraph, the term ‘own’ means to own an equity interest (or the equivalent thereof) of more than 10 percent.” 47 U.S.C. § 153(1)

RESPONSE:

The following WorldCom, Inc. (“MCI”) subsidiaries are CLECs that provide telecommunications services in Massachusetts:

MCImetro Access Transmission Services LLC

MCI WorldCom Communications, Inc.

Metropolitan Fiber Systems/McCourt, Inc.

Brooks Fiber Communications of Massachusetts, Inc.

Intermedia Communications, Inc.

MCI further states that MCI is not an affiliate of an ILEC.

ATT-CLEC-2 Please state whether the CLEC currently uses non-ILEC switches to provide local exchange service to Massachusetts customers via analog voice-grade loops. (For purposes of this question, please do not include any DS-0 or voice grade switched circuits that are part of a T1 circuit or a DS-1 or above circuit.) If so, for each such switch please provide the following information:

- a. The switch type, including manufacturer and model;
- b. The 8-digit common language location identifier (“CLLI”) code as it appears in the Local Exchange Routing Guide (“LERG”);
- c. The switch location by street address, city or town, and state if other than Massachusetts;
- d. A list of all NPA/NXX codes or 1000s blocks of numbers served with the switch;
- e. Currently equipped and currently utilized line-side capacity, by number of DS0 and DS1 circuits;
- f. The number of customers being served by the switch who receive:
  - i. Only voice service;
  - ii. Only data service; and
  - iii. Voice and data service; and
- g. A list of all Verizon-Massachusetts (“Verizon”) central offices (“COs”) in which the CLEC has a collocation arrangement which subtends to the switch.

RESPONSE:

MCI presently uses switches owned by MCI to provide local exchange service to Massachusetts customers. MCI has provided certain confidential data responsive to subparts (a) – (e) of this request in the attached confidential document. With respect to subpart (f) of this request, MCI does not compile or maintain the requested information in the ordinary course of business. MCI has provided certain confidential information responsive to subpart (f) in the attached confidential document. MCI further states in response to subpart (g) of this request that the phrase “subtends the switch” is applicable only to “hub and spoke” network topologies, and that MCI’s local network does not utilize a “hub and spoke” topology. MCI has provided certain confidential collocation information responsive to subpart (g) of this request in the attached confidential document.

ATT-CLEC-3 Please provide the following general information regarding any local exchange service that the CLEC is currently offer to customers in Massachusetts using voice-grade loops served by a non-ILEC switch (i.e., excluding service offered via UNE-P or via T1 circuits or DS1 or above circuits).

- a. Does the CLEC currently provide local exchange service to residential customers in Massachusetts using voice-grade loops served by a non-ILEC switch? Are you currently advertising or marketing this service, and if so how?
- b. Do you currently provide local exchange service to business customers in Massachusetts using voice-grade loops served by a non-ILEC switch? Are you currently advertising or marketing this service, and if so how?
- c. If the CLEC has offerings of local exchange service using voice-grade loops served by a non-ILEC switch that are targeted to specific customer segments within Massachusetts (e.g., a residential offering, a small business offering, an offering available in only a portion of the state, etc.), please provide a list and description of these offerings, including a description of the service offered and a full explanation of the customer segment to which it is offered or provided. Please also indicate which, if any, of these offerings are provisioned on a UNE-L basis, and where.

RESPONSE:

- (a) No, MCI is not currently providing local exchange services to residential customers in Massachusetts via a non-ILEC switch.
- (b) Yes, MCI is currently providing local exchange services to business customers in Massachusetts. MCI states that it is continuing to search for information related to its advertising or marketing activity and will provide any responsive information promptly if it becomes available.
- (c) MCI is providing local exchange services to business customers in Massachusetts using MCI's own switches. MCI's local exchange service offerings to business customers are set forth in tariffs on file with the Department. MCI further states that it has provided certain confidential information responsive to subpart (c) of this request in response to ATT-CLECs- 2(f) above.

ATT-CLEC-4 Please state whether the CLEC leases voice-grade loops from Verizon to provide local exchange service in Massachusetts on a UNE-L basis. (For purposes of this question, please do not include any DS-0 or voice grade switched circuits that are part of a T1 circuit or a DS-1 or above circuit.) If so, please provide, for the most recently available point in time (specifying what it is), and for each Verizon wire center serving area in which you offer service (if the data is available), for each CLEC switch through which you offer service (identifying switches by CLLI code), and on a statewide basis, the number for your company of:

- a. Residential customers so served;
- b. Business customer locations so served with 1 to 4 lines;
- c. Business customer locations so served with 5 to 9 lines;
- d. Business customer locations so served with 10 to 16 lines; and
- e. Business customer locations so served with 17 to 24 lines.

RESPONSE:

MCI states that it is presently offering local exchange services to business customers in Massachusetts on a UNE-L basis. MCI further states as follows:

- a. None.
- b – e. MCI has provided certain confidential information responsive to subparts (b) – (e) of this request in response to ATT-CLECs- 2(f) above.

ATT-CLEC-5 For each Verizon CO in which the CLEC maintains a collocation arrangement used to provide service to customers using unbundled voice-grade loops (i.e., excluding service offered via UNE-P or via T1 circuits or DS1 or above circuits) on a UNE-L basis, please provide the total number of loops at the end of each quarter from January 1, 2002, to the present for the following categories:

- a. Residential;
- b. Business customer locations with 1 to 4 lines;
- c. Business customer locations with 5 to 8 lines;
- d. Business customer locations with 9 to 16 lines; and
- e. Business customer locations with 17 to 24 lines.

RESPONSE:

MCI does not compile or maintain the requested information in the ordinary course of business. MCI states that it is presently offering local exchange services to business customers in Massachusetts on a UNE-L basis. MCI further states as follows:

- a. None.
- b – e. MCI states that it has provided certain confidential information responsive to subparts (b) – (e) of this request in response to ATT-CLECs- 2(f) above.

ATT-CLEC-6 For each Verizon CO where the CLEC serves customers on a UNE-L basis, and for each quarter since January 1, 2002, please provide the following information:

- a. The number of ILEC-to-CLEC hot cuts that the CLEC requested from Verizon, and the number of such hot cuts that Verizon performed for the CLEC;
- b. The number of CLEC-to-CLEC hot cuts that the CLEC requested from Verizon, and the number of such hot cuts that Verizon performed for the CLEC;
- c. A breakdown of performed hot cuts by the type of hot cut (e.g., individual or batch);
- d. The percentage of hot cuts that required a field dispatch; and
- e. The percentage (listed separately) of hot cuts:
  - i. That were not completed by the scheduled due date; and
  - ii. That resulted in customer-affecting line trouble.

RESPONSE:

MCI does not compile or maintain the requested information in the ordinary course of business.

ATT-CLEC-7 Please describe the method or methods by which the CLEC requests hot cuts from Verizon. Please also describe the method or method by which the CLEC obtains notification of completed hot cuts.

RESPONSE: MCI is actively researching and assembling the requested information and will provide a supplemental response as soon as possible.

ATT-CLEC-8 Please state whether the CLEC leases UNE-P arrangements from Verizon to provide local exchange service in Massachusetts. If so, please provide, for the most recently available point in time (specifying what it is), and for each Verizon wire center serving area in which you offer service (if the data is available), and on a statewide basis, the number for your company of:

- a. Residential customers so served;
- b. Business customer locations so served with 1 to 4 lines;
- c. Business customer locations so served with 5 to 9 lines;
- d. Business customer locations so served with 10 to 16 lines; and
- e. Business customer locations so served with 17 to 24 lines.

RESPONSE:

- (a) The number of MCI's residential customers on UNE-P arrangements provided by Verizon is set forth in the attached confidential document.
- (b)–(e) MCI does not compile or maintain the requested information in the ordinary course of business. Subject to the foregoing, MCI is providing the number of business customers on UNE-P arrangements provided by Verizon in the attached confidential document.



ATT-CLEC-9 If the CLEC provides cable television service in Massachusetts, please state for the state as a whole and, to the extent available, for each city or town in Massachusetts:

- a. To how many customer locations does the CLEC provide local exchange service?
- b. To what percent of the CLEC's telephony customers does the CLEC provide standalone local exchange service , without also providing either broadband or cable television service? What is the typical or average price for this service?
- c. To what percent of the CLEC's telephony customers does the CLEC provide local exchange service together with broadband service, without also providing cable television service? What is the typical or average price for this combined service?
- d. To what percent of the CLEC's telephony customers does the CLEC provide local exchange service together with cable television service, without also providing broadband service? What is the typical or average price for this combined service?
- e. To what percent of the CLEC's telephony customers does the CLEC provide local exchange service together with both cable television and broadband service? What is the typical or average price for this combined service?

RESPONSE:

MCI does not provide cable television services in Massachusetts.

ATT-CLEC-10 Please state whether the CLEC owns one or more dedicated transport circuits which provides an unswitched transmission path at a DS1 or higher level between any two Verizon central offices at which the CLEC maintains active physical collocation facilities. If the answer is yes, please provide the following information:

- a: As to each such pair of central offices, state:
  - i. The common name, address and CLLI code for each pair of central offices;
  - ii. The transmission level of each dedicated transport circuit terminating at both physical collocation facilities (e.g., DS1, DS3, OC3, etc.); and
  - iii. Whether the CLEC is “operationally ready” (as the phrase is used in Triennial Review Order ¶ 406) to provide dedicated transport between those two Verizon central offices.
- b. Does the CLEC purchase, lease or otherwise obtain UNE Transport, special access, or any other type of transmission capacity on the route, or any portion thereof, between any pair of COs just identified? If so, please identify the type of transmission capacity and the pair of central offices served by this capacity.

RESPONSE:

MCI presently owns fiber transmission facilities used to provide service to business customers in Massachusetts. MCI further states that it has provided certain confidential transport data in the attached confidential document identified as “MCI Response to ATT-CLECs-10.” MCI further states that it does not structure its transport paths between Verizon central offices. To the extent that this request seeks information other than that provided in the attached confidential document, MCI does not maintain such information in the ordinary course of business. In response to subpart (a)(iii) of this request, MCI states that its ability to provide dedicated transport between various points on its network depends upon various factors, including customer demand, utilization of existing optronics systems, availability of spare fibers, and other factors. MCI has furnished the number of spare DS-3s in each “on net” collocation.

- ATT-CLEC-11 Please state whether the CLEC has any long-term (10 or more years) dark fiber indefeasible rights-of-use (“IRUs”) between any two Verizon COs at which the CLEC maintains active physical collocation facilities. If the answer is yes, please provide the following information:
- a. As to each pair of central offices, identify:
    - i. The common name, address and CLLI code for each pair of central offices,
    - ii. The number of dark fiber circuits terminating at both of the physical collocation facilities,
    - iii. The term of the IRU.
  - b. Does the CLEC purchase, lease or otherwise obtain UNE Transport, special access, or any other type of transmission capacity on the route, or any portion thereof, between any pair of COs just identified? If so, please identify the type of transmission capacity and the pair of central offices served by this capacity.

RESPONSE:

MCI has deployed its own transport facilities in Massachusetts, under its ownership and control, as reflected in MCI’s response to ATT-CLECs-10 above. MCI further states that it is not the grantee of any IRUs in Massachusetts.

ATT-CLEC-12 Please state whether the CLEC offer dedicated transport to unaffiliated carriers on a wholesale basis between any pairs of Verizon COs? If so, for each such pair of Verizon COs, please provide the following:

- a. How such transport is offered to unaffiliated carriers (e.g., through tariffs, standard contracts, individually negotiated contracts),
- b. The levels (DS1, DS3, OC3, etc.) at which such dedicated transport has been provided to wholesale customers,
- c. The amount of unused lit capacity available for purchase by unaffiliated carriers on a wholesale basis, at each transmission level.

RESPONSE: MCI is actively researching and assembling the requested information and will provide a supplemental response as soon as possible.